

Joint Audit Committee

27 January 2022

Responsible Officer:	Impact on Business:		Risk Register Reference & RAG
James Haylett Chief Executive	High		
	Medium	X	
	Low		
Lead Manager:	Report Type:		
Jack Hudson Head of Business Support	Governance	X	
	Strategic		
	Operational		
Previous papers to Joint Audit Committee:			
Integrity Assurance Report. 29 October 2020			

Report summary	<p>This is an outturn report. It covers the period between April 2020 and March 2021. It provides a summary of the non-financial integrity arrangements, which the Acting Police and Crime Commissioner and Cambridgeshire Constabulary had in place during the reporting period.</p> <p>The report provides a summary of:</p> <ul style="list-style-type: none"> • The controls process, how the various controls processes operated during the reporting period and evidence of their effectiveness; and • A complaints update. 			
Related Police and Crime Plan objectives				
Action (tick one box only)	Information <input checked="" type="checkbox"/>	Assurance <input type="checkbox"/>	Approval <input type="checkbox"/>	Decision <input type="checkbox"/>
Recommendation	To note the report.			

OVERVIEW OF INTEGRITY CONTROLS ASSURANCE

This is an outturn report. It covers the period between April 2020 and March 2021. It provides a summary of the non-financial integrity arrangements, which the then Acting Police and Crime Commissioner (the “Acting Commissioner”) and Cambridgeshire Constabulary (the “Constabulary”) had in place during the reporting period.

In May 2021 a new Police & Crime Commissioner (the “Commissioner”) for Cambridge and Peterborough was elected. The Commissioner and the Chief Constable are committed to the need for governance, oversight and the delivery of professional behaviour within the Constabulary and the Commissioner’s own office, the Office of the Police and Crime Commissioner (OPCC). The Commissioner recognises the importance of effective integrity controls and upon taking up his role, sought assurance that the necessary controls remain in place and that they are effective. The Chief Constable has reiterated the Constabulary’s commitment to integrity as a core value of his vision for a safer Cambridgeshire.

Integrity is defined as ‘doing the right thing in the right way’. It cuts across all areas of policing in respect of the decisions that are made and how people are treated. There is an institutional as well as personal responsibility for integrity to ensure we meet the expectations of the public. Public confidence in police integrity can be met, and equally undermined, in the light of their own experiences, those within their communities, and those relating to national issues whether current or historical. Therefore, we must have mechanisms to respond to, and build confidence, which resonate with national requirements but recognise our local identity.

The College of Policing’s Code of Ethics places integrity ‘at the heart of every policy, procedure, decision and action in policing’. This is to ensure that there are the highest personal standards for everyone in policing. No one element or approach to driving integrity can stand-alone. Pro-activity around integrity such as the Code of Ethics, behaviours, conduct, decision making, governance processes and controls assurances, are taken together to ensure the public can be assured that the Commissioner, his office, and the Constabulary, act fairly, honestly, respectfully and ethically.

This Report specifically provides a summary of:

- the controls process, how the various control processes have operated during the reporting period and evidence of their effectiveness; and
- complaints update

The report also provides an ongoing commitment from both the Commissioner and the Constabulary that they recognise and support the principle that all those in policing should uphold and embed the highest standards of ethical behaviour, personal conduct, and at the same time be transparent and accountable for their actions.

James Haylett

Chief Executive, Office of Cambridgeshire Police and Crime Commissioner

1. Introduction

- 1.1 Integrity is about 'doing the right thing in the right way'. The Cambridgeshire Police and Crime Commissioner (the "Commissioner") and the Chief Constable are clear that integrity is the responsibility of all those in policing. The demonstration of integrity is not one that can easily be measured by statistics alone. Equally, integrity should not be driven by a target culture which can create perverse incentives and consequently drive down public confidence. Whilst outputs and statistics can be useful, for example in measuring compliance with statutory guidance for complaint handling, outcomes are the key measure.
- 1.2 Outcomes can be realised in many ways across the integrity agenda and can be influenced by a number of factors. What is important is that there is a culture of integrity and that there are appropriate levels of scrutiny, challenge and support to ensure that policing principles and standards of professional behaviour are embedded in everyday policing; ones which the public can have confidence in.
- 1.3 Robust control processes remain in place to ensure the non-financial integrity of policing in Cambridgeshire. These processes have pro-actively driven a culture of integrity through establishing standards, setting methods for measuring actual performance, comparing results, taking into account risks, issues and mitigation, reinforcing strengths and taking necessary corrective action.
- 1.4 These processes have taken place at a range of levels to provide appropriate control and assurance in terms of both hierarchy and independence. This means that some of these processes are the sole or joint responsibility of the Acting Commissioner and/or the Chief Constable. Some relate to Cambridgeshire's oversight responsibility on behalf of Bedfordshire and Hertfordshire, as collaboration partners, for some business areas such as the Professional Standards Department (PSD).

2. Control processes

- 2.1 The three controls governance groupings to reflect the business or their autonomy are:
 - Domestic – those that deal with integrity within the Constabulary and on behalf of the Commissioner;
 - Collaborative – those where the Constabulary and the Commissioner are responsible for leading on behalf of the strategic collaborative alliance with Bedfordshire and Hertfordshire (the "Strategic Alliance");
 - Independent – those that have independent members.
- 2.2 Each of these controls processes are shown at **Appendix 1**.

3. Evidence of the control processes being used and their effectiveness during the reporting period (April 2020 – March 2021)

Domestic – those that deal with the integrity within the Constabulary and on behalf of the Commissioner.

- 3.1 The various control processes and the governance groups as given at **Appendix 1**, continue to function in their respective roles, provide support, challenge and scrutiny in line with their purpose and met regularly during the reporting period.
- 3.2 Between April 2020 and March 2021, the Acting Commissioner’s Business Co-ordination Board (BCB) convened on 14 separate occasions. The Board pro-actively set the agenda by calling for reports to ensure the Chief Constable was held to account for matters relating to performance and integrity. The Acting Commissioner’s key decisions, such as those in respect of collaboration with other police forces, financial spend, estates and complaints policy review are also decided at BCB. During the reporting period 13 decision notes were published.
- 3.3 Underpinning BCB is the “Resources Group”. This was established in January 2020; this is a subgroup of BCB. The purpose of this Group is to enable strategic discussions concerning the resourcing requirements for the delivery of the Police and Crime Plan (the “Plan”)¹. Resources Group considers the implications of forecasting (environmental scanning, strategic assessments, demand, risks) and the development and integration of key organisational management strategies. Membership of the Resource Group consists of the senior leadership teams from the Commissioner’s Office and the group meet every month.
- 3.4 During this reporting period the Constabulary launched their Corporate Plan (June 2020). The Corporate Plan focuses on the Constabulary’s operational and organisational priorities. The Plan makes explicit the Values of the Constabulary as being Fairness, Integrity, Diligence and Impartiality. A performance framework was developed with both qualitative and quantitative measures reported to BCB². The Constabulary has a number of board and governance structures in place. These support the delivery of the Constabulary’s Corporate Plan.

Collaborative – those where the Constabulary and the Commissioner are responsible for leading on behalf of the Strategic Alliance.

Professional Standards Department (PSD)

- 3.5 The Commissioner’s office undertook a series of random sampling of complaints to monitor the way in which the Constabulary responds to these and the lessons learnt. Further assurance regarding complaint handling was gained during the year through the Commissioner being represented on the PSD Governance Board.

This provided the opportunity to support and scrutinise policies, procedures, and performance related to complaint handling, anti-corruption, and vetting, in line with legislation, national guidance and the Code of Ethics for policing.

¹ The Commissioner launched his Police and Crime Plan in November 2021.

² Since the launch of the Commissioner’s Police and Crime Plan in November 2021, the OPCC have been working with the Constabulary to ensure alignment between the Constabulary’s Corporate Plan and the five themes contained within the new Commissioner’s Police and Crime Plan.

Independent – those that have independent members

Police and Crime Panel

- 3.6 During the reporting period the Police and Crime Panel (the “Panel”) met on seven separate occasions. One of these was a confirmation hearing (March 2021). During these meetings the Panel have seen reports at each meeting in respect of their remit to scrutinise and support the then Acting Commissioner in the exercise of his statutory functions. Reports have included how the Acting Commissioner monitored the delivery of his Plan, the demonstration of the transparency and integrity regarding financial planning, which includes the Medium-Term Financial Strategy leading up to the final Budget and Precept reports, and how the Acting Commissioner held the Constabulary to account. The Panel also reviewed the Acting Commissioner’s key decisions.

Joint Audit Committee

- 3.7 The Joint Audit Committee (JAC) meets on a quarterly basis. Between April 2020 and March 2021, JAC met on four separate occasions. JAC considers the adequacy of the governance and risk management framework (Strategic and Operational Risk Registers and Internal and External Audit Plans and audits), the internal control environment and financial reporting. They continue to provide independent advice and assurance to the Commissioner and Chief Constable. In addition they play an important role in advising on the annual audit plan.

Internal Audit

- 3.8 During the reporting period RSM undertook a review of Ethics and Equality as part of their annual internal audit plan for 2020/21. The purpose of this review was to assess the controls, systems and processes in place to promote an ethical culture and to manage equality and diversity. This internal audit concluded that ‘robust controls, systems and processes were in place governing ethics and equality, including a clear governance and reporting structure. Appropriate policies and procedures were also in place. There was evidence of the delivery of diversity and inclusion training as part of mandatory induction training. There was a robust ethics and culture delivery plan (the EDEI delivery plan) in place, with an identified forum in place to monitor progress. Processes were also in place to hold the Chief Constable to account for ethics and diversity. A forum is in place (the Organisational Learning Group) for the sharing of organisation learning arising from complaints and reviews’.

The conclusions also noted that projects linked to the Chief Constable’s ‘Big Conversation’, are being progressed. These projects are designed to improve understanding of ethical and diversity issues and the culture of the Constabulary.

Three low priority findings were identified in the report presented to JAC. These related to processes and/or documentation of processes, which could be improved, and agreed three actions to address these issues.

Independent Custody Visitors

- 3.9 Independent Custody Visitors (ICVs) are volunteers representing the local community who make unannounced visits to police custody where they check on the rights, entitlements and welfare of detainees as well as the conditions of custody. This public oversight helps to prevent harm, it provides public reassurance that custody is safe and contributes to the human rights obligations.

During the reporting period, the work of the ICVs was impacted by Covid-19. This restricted the ability for volunteers to physically visit individual custody suites. As a result of this and to maintain integrity telephone visits were undertaken. ICVs carried out 25 visits across all suites including telephone visits which were recorded as a single visit, albeit they covered both suites. ICVs spoke to 56 detainees and observed 15 of the 138 detainees in custody at the time of visits. 68 detainees were not available to speak to (they may have been asleep, in interview, speaking to a solicitor or with a healthcare provider). Visits were carried out on various days throughout the week, and with a concerted effort to visit on different days, including weekends.

An annual report on the ICV is produced. More information on the scheme and how it is run is available on the OPCC website.

Out of Court Disposals Scrutiny Panel

- 3.10 The independent Out of Court Disposals Scrutiny Panel continues to meet four times a year and a member of the Commissioner's office sits on this Panel in an observer capacity. During the reporting period the Out of Court Disposals Scrutiny Panel considered a range of randomly selected cases that have been resolved by use of an out of court disposal and actively challenged the Constabulary to ensure the action taken was appropriate in the circumstances.

Stop & Search / Use of Force Scrutiny Panels

- 3.11 In the annual Integrity Control Report covering the period April 2019 to March 2020³, the Acting Commissioner and the Chief Constable outlined their proposals to develop scrutiny panels to look at the Constabulary's use of Stop & Search and the Use of Force. During the reporting period the OPCC worked with the Constabulary to commission these scrutiny panels⁴. These panels were developed to be representative of the communities the Constabulary serves. Their purpose is to provide the Constabulary with a community perspective and help them gain an understanding of the extent of any local concerns regarding integrity issues and an insight on policing policies and practices and their impact within these communities. Due to Covid restrictions, whilst the Panels were established, they were unable to meet until the period 2021/22. The effectiveness of these panels will be reported upon in the next annual integrity controls report due later in the year.

³ Presented to JAC on 29 October 2020

⁴ The first scrutiny panel met on 5 July 2021 and covered Stop & Search.

4. External integrity drivers

- 4.1 During the reporting period, HMICFRS undertook a number of thematic⁵ inspections of the Constabulary. Details of these inspections can be found on the HMICFRS web site². The Commissioner has a statutory duty to respond to the Home Secretary regarding HMICFRS inspections, the responses are published on the Commissioners website³. During the reporting period the Acting Commissioner published responses to eight inspections. The HMICFRS also undertake inspections focused upon efficiency and effectiveness. In January 2022, HMICFRS commenced a further PEEL inspection of the Constabulary.
- 4.2 The Constabulary's Business Assurance Meeting, held quarterly is chaired by the Deputy Chief Constable and provides regular assurance about the progress of recommendations from all inspections. Support is provided by additional assurance mechanisms. For example the Governance and Inspection Team track the progress made by the Constabulary against any HMICFRS recommendation. Regular progress updates are provided to Business Assurance Meeting as well as the Constabulary's Change Board. Recommendation which relate to the role of the Professional Standards Department (PSD), are tracked through the PSD Governance Board. Inspection reports are also taken to the Constabulary's Force Executive Board and the Commissioner's Business Co-ordination Board. This contributes to the Commissioner fulfilling his statutory duty in preparing and publishing comments on the reports as required by, section 55 of the Police Act 1996.

5. Complaints

- 5.1 There are a number of roles and responsibilities within the complaints system. The Chief Constable is responsible, as the Appropriate Authority, for complaints and conduct matters relating to his officers and staff, although he has delegated this function to the Deputy Chief Constable's Office. The Commissioner has a statutory duty to handle complaints made against the Chief Constable, undertake reviews of complaints, and monitor the complaints system. The Police and Crime Panel has a statutory duty to handle complaints against the Commissioner and the Deputy Police and Crime Commissioner, with delegated authority given in certain circumstances to the Chief Executive of the OPCC.
- 5.2 By its legislative nature, a complaints process is primarily predicated on statutory requirements, such as recording timescales nonetheless, a complaints process should be able to challenge the culture of an organisation and in doing so ensure that robust checks and balances are in place, and that learning is seen as a necessary outcome for individual officers, staff and the organisation.
- 5.3 The Policing and Crime Act 2017 and supporting regulations made significant changes to the police complaints and disciplinary systems. From February 2020, a number of changes, designed to achieve a more customer-focused and simplified complaints

⁵ These inspections examine a key issue across a representative number of forces, and comment solely on performance in relation to that key issue.

²[HMICFRS publication](#)

³[Commissioners Web Site](#).

system was introduced. Complaints can be dealt with quickly, effectively and proportionately, with an emphasis on individual and organisational learning. This in part has impacted on the way complaints against the Constabulary are handled, and the Commissioner's involvement in the complaints process. The Commissioner is the relevant review body for most complaints and the Independent Office for Police Conduct (IOPC) is the responsible body for serious complaints such as Chief Officer complaints or those relating to gross misconduct.

5.4 Between April 2020 and March 2021 the following complaints were recorded;

- The Acting Commissioner received 36 requests for review, this was the first year of the Commissioner becoming the relevant review body. Four of these were initially considered not valid as they were made out of time, however after consideration of the circumstances they were accepted. Five were considered not valid as they were made out of time and were not accepted. Further information is available on the Commissioner's website⁶.
- The Acting Commissioner received six concerns regarding the Chief Constable, which were considered and dealt with by the OPCC. None of these were formally recorded as a complaint in line with statutory guidance.
- No complaints were received against the Acting Commissioner.

⁶ <https://www.cambridgeshire-pcc.gov.uk/accessing-information/complaints/complaints-review/>

Appendix 1

Control processes

Domestic – those that deal with integrity within the Constabulary and on behalf of the Commissioner

Business Co-ordination Board

The Business Coordination Board (BCB) meets on a four to six weekly basis and is Chaired by the Commissioner, and whose members are from the Constabulary's Chief Officer Team, and the Chief Executive and Chief Finance Officer from the Office of the Police and Crime Commissioner (OPCC). The BCB takes a proportionate and risk-based approach to governance and reporting requirements, being mindful of both the Acting Commissioner's and the Chief Constable's statutory duties. Minutes of the meeting and key papers are published on the Commissioner's website, unless officially sensitive or commercial in confidence.

Force Executive Board

The Force Executive Board (FEB) is the Constabulary's most senior management team, the Board meet on a monthly basis. FEB members include the Chief Constable, Deputy Chief Constable and Assistant Chief Constable. The remaining members each represent a directorate or department and staff association representatives. All the members support and advise the Chief Constable in the overall strategic direction of the Constabulary.

Business Assurance Meeting

The Business Assurance Meeting takes place on a quarterly basis and these are chaired by the Deputy Chief Constable. The meeting provides regular assurance about the progress of recommendations from all inspections.

Data Integrity Delivery Group

The Group meets regularly and considers and embeds recommendations from national and Constabulary specific reports into working practices.

Collaborative – those where the Constabulary and the Commissioner are the responsible for leading on behalf of the Strategic Alliance with Bedfordshire and Hertfordshire

PSD Governance Board

This Board meets every three months and is chaired by the Deputy Chief Constable from the Constabulary with senior level membership from the Constabulary, Bedfordshire Police and Hertfordshire Constabulary, and OPCC representatives from their respective OPCC offices. The Board is responsible for the governance and oversight of all PSD business. Updates from this Board are provided to both the Joint Chief Officer Board and Strategic Alliance Summit, chaired by the Deputy Chief Constable from Cambridgeshire Constabulary.

Independent – those that have independent members.

Police and Crime Panel

The Cambridgeshire Police and Crime Panel provides support and challenge to the Acting Commissioner. The Police and Crime Panel also has a statutory role of overseeing all complaints against the Acting Commissioner. Any complaints are handled in accordance with the legislation, IOPC guidance and their own Complaints Procedure. A report is presented to the Police and Crime Panel at each meeting updating them on any complaints received against the Acting Commissioner.

Joint Audit Committee

The Joint Audit Committee comprises five members who are independent of the Commissioner and the Constabulary. The Committee, which meets quarterly, provides an independent assurance on the adequacy of the corporate governance and risk management arrangements in place.

Out of Court Disposals Scrutiny Panel

The purpose of the Scrutiny Panel is to independently review a selection of cases that have been resolved by use of an out of court disposal by the Constabulary. Its aim is to determine whether the method of disposal, such as a cannabis warning or a simple caution, is considered appropriate based on a review of the information available to the decision maker at the time. The Panel meets four times a year and has an independent Chair and membership, made up from representatives of the judiciary, Crown Prosecution Service, Youth Offending Teams and includes a representative from the Office of the Police and Crime Commissioner in an observer capacity. The Constabulary takes the Panel's recommendations and actively translate these into learning and development at both individual feedback level and across the Constabulary.